

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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YURMAN STUDIO, INC. and YURMAN  
DESIGN, INC.,

Plaintiffs/Counter-Defendants,

- against -

ELENA CASTANEDA and EJEWELER LLC  
d/b/a OVERSTOCKJEWELER.COM,

Defendants/Counter-Plaintiffs.  
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Civil Action No. 07-1241 (SAS)(HP)  
(Action No. 1)

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CARTIER, a division of RICHEMONT NORTH  
AMERICA, INC., CARTIER INTERNATIONAL,  
N.V., CARTIER CREATION STUDIO, S.A., VAN  
CLEEF & ARPELS S.A., VAN CLEEF &  
ARPELS, INC., VAN CLEEF & ARPELS  
DISTRIBUTION, INC., GUCCI AMERICA, INC.,  
and BULGARI S.p.A.,

Plaintiffs,

- against -

ELENA CASTANEDA and EJEWELER LLC  
d/b/a OVERSTOCKJEWELER.COM,

Defendants.  
----- X

Civil Action No. 07-7862 (SAS)(HP)  
(Action No. 2)

**DECLARATION OF LOUIS S. EDERER, ESQ. IN SUPPORT  
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

LOUIS S. EDERER, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that  
the following is true and correct to the best of his knowledge:

1. I am a member of the firm of Arnold & Porter LLP, counsel for plaintiffs Yurman  
Studio, Inc., Yurman Design, Inc., Cartier, a division of Richemont North America, Inc., Cartier

International, N.V., Cartier Creation Studio, S.A., Gucci America, Inc. and Bulgari S.p.A. (collectively "Plaintiffs"). I make this declaration in support of Plaintiffs motion for partial summary judgment.


2. Attached hereto as Exhibit A are pertinent excerpts from the transcripts of the deposition of Defendant Elena Castaneda taken on February 7, 2008, February 8, 2008 and March 18, 2008.

3. Attached hereto as Exhibit B are pertinent excerpts from the transcript of the deposition of Alice Limantara taken on April 22, 2008.

4. Attached hereto as Exhibit C is a printout of the "About Us" web page from [www.overstockjeweler.com](http://www.overstockjeweler.com), which has been previously marked as Plaintiffs' Deposition Exhibit 3.

5. Attached hereto as Exhibit D is a printout of the "Disclaimer" web page from [www.overstockjeweler.com](http://www.overstockjeweler.com), which has been previously marked as Plaintiffs' Deposition Exhibit 17.

DECLARED UNDER PENALTY OF PERJURY THIS 13th DAY OF June, 2008.

  
Louis S. Ederer